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Attorneys for Defendant, **BRANT BLAKEMAN**

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

CORY SPENCER, an individual;
DIANA MILENA REED, an individual;
and COASTAL PROTECTION
RANGERS, INC., a California non-profit
public benefit corporation,

Plaintiffs ,

v.

LUNADA BAY BOYS; THE
INDIVIDUAL MEMBERS OF THE
LUNADA BAY BOYS, including but
not limited to SANG LEE, BRANT
BLAKEMAN, ALAN JOHNSTON
AKA JALIAN JOHNSTON, MICHAEL
RAE PAPAYANS, ANGELO
FERRARA, FRANK FERRARA,
CHARLIE FERRARA, and NICOLAS
FERRARA; CITY OF PALOS
VERDES ESTATES; CHIEF OF
POLICE JEFF KEPLEY, in his
representative capacity; and DOES 1-10,

Defendants.

Case No.: 2:16-CV-2129-SJO-RAO

Assigned to Courtroom: 10C
The Honorable S. James Otero

Magistrate Judge:
Hon. Rozella A. Oliver

**NOTICE OF MOTION AND
MOTION OF DEFENDANT BRANT
BLAKEMAN TO COMPEL
DISCOVERY RESPONSES; JOINT
STIPULATION RE: DISCOVERY
PROPOUNDED BY DEFENDANT
BRANT BLAKEMAN TO
PLAINTIFFS [L.R.37-2.1];
DECLARATIONS OF JOHN P.
WORGUL, RICHARD P.
DIEFFENBACH, PETER H.
CROSSIN, AND VICTOR OTTEN;
AND REQUEST FOR SANCTIONS
IN THE AMOUNT OF \$6,800**

**Date: January 4, 2017
Time: 10:00a.m.
Courtroom: F
United States Courthouse
312 N. Spring St
Los Angeles, CA, 90012**

**Discovery Cut-Off
Date: 8/7/17**

Pretrial Conf. Date: 10/23/17
Trial Date: 11/7/17

**TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF
RECORD:**

PLEASE TAKE NOTICE that on January 4, 2017, at 10:00 a.m., or as soon thereafter as counsel may be heard, Defendant BRANT BLAKEMAN will bring on for hearing the within Motion to Compel Responses to Discovery and for sanctions in the amount of \$6,800, before United States Magistrate Judge Rozella A. Oliver, in Courtroom F of the United States Courthouse located at 312 N. Spring Street, Los Angeles, CA.

This motion is made pursuant to Federal Rules of Civil Procedure R. 37 and Local Rules 37-1, *et seq.*, on the grounds that Plaintiffs CORY SPENCER, DIANA MILENA REED, and COASTAL PROTECTION RANGERS, INC. (Plaintiffs), have failed to disclose, answer and/or respond to interrogatories and requests for production properly propounded by Defendant BRANT BLAKEMAN. In addition, sanctions against Plaintiffs and their counsel-of-record, jointly and severally, are appropriate for Plaintiffs' and their counsel's abuse of the discovery process and failure to comply with L.R. 37-1, *et seq.*

This Motion is based on this notice; the attached Joint Stipulation re: Discovery Propounded by Defendant BRANT BLAKEMAN, filed herewith; the Declarations of John P. Worgul, Richard P. Dieffenbach, Peter H. Crossin, and Victor Otten, filed herewith; and the pleadings proceedings heretofore had herein.

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CERTIFICATION

Pursuant to Fed. R. Civ. P. 37(a)(1) and L.R. 37-1, counsel for Defendant BRANT BLAKEMAN met and conferred with Plaintiffs' counsel in a good-faith effort to resolve the discovery matters that are the subject of this motion.

Respectfully submitted,

DATED: December 7, 2016

VEATCH CARLSON, LLP

By: /s/ Peter H. Crossin
ROBERT T. MACKEY
RICHARD P. DIEFFENBACH
PETER H. CROSSIN
JOHN P. WORGUL

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